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April 30, 2019

BY ECF

Hon. Carol B. Amon United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: <u>United States v. Edgar Veytia</u>, Dkt. No. 17 CR 115 (CBA)

Dear Judge Amon:

I am writing on behalf of defendant Edgar Veytia and with the consent of the government to respectfully request an adjournment of the defendant's June 6, 2019 sentencing until the week of July 8, 2019. The reason for this second request is our continued delay in receiving records from Mexico related to the defendant's former role as the attorney general of the state of Nayarit, which was central to the government's theory of prosecution. We anticipate that these materials will include details of the multiple social service programs he instituted while in office, commendations that he received for his efforts, and letters documenting his good deeds. We believe that these materials will feature prominently at the defendant's sentencing as they bear on both the nature and circumstances of the offense, as well as his personal history and characteristics (see 18 U.S.C. § 3553(a)(1)), however, our efforts in sourcing them have been hampered due to the change in administrations in Nayarit since Mr. Veytia left office, and of course, they must be translated into English upon receipt, further adding to the delay.

Thank you for your consideration on this application; I remain available for a conference should the Court deem it necessary.

Respectfully submitted,

Jeffrey/Lichtman

cc: Craig Heeren, Esq.
Ryan Harris, Esq.
Assistant United States Attorneys (by ECF)